

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

CHAPTER 13

RENEE CURTIS-CAREY a/k/a  
RENEE CURTIS

CASE NO: 16-17392AMC

Debtor

**NOTICE OF DEBTOR'S MOTION TO DECLARE LIEN SATISFIED**

The Debtor's attorney has filed papers seeking a determination that your lien has been satisfied by Debtor's completion of the Chapter 13 plan.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**
2. **If you do not want the court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **February 16, 2022 (02/16/2022)** you or your attorney must file a response to the Motion.** (See instructions on next page).
3. **A hearing on the Motion** is scheduled to be held on **March 8, 2022 (03/08/2022)**, at 1:00 PM in Courtroom 1 (telephonically: 1.877.336.1828 Access Code 1229352#), United States Bankruptcy Court, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.
6. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
8. **If you are not required to file electronically**, you must file your response at  
  
United States Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107
9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

ALFONSO MADRID, ESQ.  
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Attorney for Debtor  
1410 W. Erie Ave.  
Philadelphia PA 19140  
(215) 215-227-4795  
(215)227-2435 (fax)  
[amadrid@clsphila.org](mailto:amadrid@clsphila.org)

DATE: February 1, 2022